

REMARKS

Claims

Claims 1-11 have been examined. Claims 12-15 have been added. Hence, claims 1-15 are all the claims pending in the application. Claim 1 has been amended to further clarify the claimed invention, and does not narrow the literal scope of the claim and thus does not implicate an estoppel in the application of the doctrine of equivalents.

Formal Matters

Applicants thank the Examiner for considering the references submitted with the Information Disclosure Statements filed on August 12, 2004, and March 16, 2006.

However, Applicants respectfully request the Examiner to acknowledge the claim to foreign priority made on January 27, 2004 and receipt of a certified copy of the priority document filed on August 12, 2004. Applicants also respectfully request the Examiner to indicate that the drawings submitted on January 27, 2004 have been accepted.

Allowable Subject Matter

Applicants thank the Examiner for indicating that claims 9 and 10 contain allowable subject matter and would be allowable if rewritten in independent form. However, Applicants respectfully request the Examiner to hold in abeyance such rewriting of the claims until the Examiner has had an opportunity to reconsider and withdraw the rejection of the other claims.

Claim Rejections - 35 U.S.C. § 102

Claims 1-8 and 11 are rejected under 35 U.S.C. § 102(b) as allegedly being anticipated by U.S. Patent No. 4,375,584 to Muzumdar *et al.*, hereinafter “Muzumdar”. For *at least* the following reasons, Applicants respectfully traverse the rejection.

Claims 1-8

Applicants respectfully submit that claim 1 is patentable over Muzumdar. For example, claim 1 recites a telephone set comprising, *inter alia*, a telephone main body, an interchangeable dial button unit attached to said telephone main body, and an interchangeable line button unit attached to said telephone main body structured so that said interchangeable dial button unit, and said interchangeable line button unit are detachable from said telephone body from a top surface side of said telephone body *without disassembly of said telephone main body*. The Examiner contends that in figures 1 and 17 of Muzumdar, the base 12 suggests the telephone main body, and the dial keys 22 and line keys 24 correspond to the interchangeable dial button unit and the interchangeable line button unit of claim 1, respectively. Moreover, the Examiner contends that Muzumdar, in col. 5, line 48 to col. 7, line 23, discloses that the dial keys 22 and line keys 24 of the telephone keyset instrument 10 in Muzumdar are detachable from the telephone main body of the keyset instrument 10 “via cables, plugs, and receptacles” *without* disassembly of the telephone main body (Office Action at page 2). Applicants respectfully disagree.

For instance, Muzumdar does not disclose or suggest that the dial keys 22 and line keys 24 are detachable from said telephone body from a top surface side of said telephone body *without disassembly of said telephone main body* as set forth in claim 1. Muzumdar illustrates

the internal structure of the telephone instrument in figure 17 A-B, wherein the structural elements include the base 12, a mother PC board 56, a daughter PC board 58, a handsfree unit PC board 60, a display PC board 62, and a key switch PC board 64 which includes the dial keys 22 and line keys 24, a main housing 16, and a face panel 14 (see Muzumdar: figures 17 A-B, col. 6, lines 15-24, and col. 8, lines 54-55).

Muzumdar further states that the mother PC board 56, the daughter PC board 58, and the handsfree unit PC board 60 are screwed and held by tabs to the base 12, and that the display PC board 62 and the key switch PC board 64 are screwed and held by tabs to the main housing 16. The key switch PC board 64 is also connected to the mother PC board 56 via a flat ribbon cable 70, and the face panel 14 is fixed to the main housing 16 by tabs (Muzumdar, col. 6, lines 25-35).

Furthermore, Muzumdar discloses that the PC boards have relative positions as follows:

“The mother PC board 56 is arranged within the base above and substantially parallel with the bottom of the instrument. As mentioned above, this mother PC board is laterally co-extensive with the base. *The daughter PC board 58 and the handsfree unit PC board 60 are arranged side-by-side above and substantially parallel with the mother PC board 56.* The key switch PC board 64 is arranged *above the daughter PC board 58 and the handsfree unit PC board 60 just beneath the top of the main housing 16.* The key switch PC board 64 is disposed in parallel with the top of the housing 16 and the face panel 14...” (Muzumdar, figure 17B, cols. 6-7, lines 61-2, emphasis added).

Hence, the configured arrangement of the key switch PC board 64 may be summed up as follows:

- i) screwed to the main housing 16,
- ii) disposed in parallel with the top of the main housing 16 and the face panel 14.
- iii) situated above the daughter PC board 58, which itself is positioned above the mother PC board 56 as discussed above, and
- iv) connected to the mother PC board 56 via the flat ribbon cable 70, and

As such, to detach the key switch PC board 64 from the base 12, Applicants respectfully submit that one would need to *disassemble the telephone main body* of the telephone keyset instrument 10 of Muzumdar. Specifically, in order to detach the key switch PC board 64, it is required to remove the face panel 14 from the main housing 16 as shown in Figure 17A. As can be seen in Figure 17A, the telephone main body 16 is already disassembled at this step since, for example, the indentations 30 to place the telephone handset 28 are part of the face panel 14 which is separated from the main housing 16, and thus the handset 28 can no longer be placed on the main housing 16. Moreover, the next step would require the main housing 16 to be disengaged from the key switch PC board 64 using the tabs that hold the two components together (this step would be required in order to detach the key switch PC board 64 from the mother PC board 56 by unplugging the ribbon 70 that connects the key switch PC board 64 to the mother PC board 56).

Since the telephone main body of the keyset instrument 10 would be left exposed and disassembled at this point, Applicants respectfully submit Muzumdar does not disclose or suggest that the dial keys 22 and line keys 24 (both part of the key switch PC board 64) are detachable from said telephone body from a top surface side of said telephone body *without disassembly of said telephone main body* as set forth in claim 1. Accordingly, Applicants respectfully request the Examiner to withdraw the 35 U.S.C. § 102(b) rejection.

Further, since claims 2-8 depend upon claim 1 which has been shown to contain patentable subject matter above, Applicants respectfully submit claims 2-8 are patentable *at least* by virtue of their dependency.

Claim 11

Claim 11 recites features similar to the above-noted features of claim 1, i.e., claim 11 recites a key telephone system comprising, *inter alia*, a telephone set comprising a telephone main body, an interchangeable dial button unit, and an interchangeable line button unit are structured so that said interchangeable dial button unit, and said interchangeable line button unit are detachable from said telephone body from a top surface side of said telephone main body *without disassembly of said telephone main body*. As such, Applicants respectfully submit claim 11 is patentable *at least* for reasons analogous to those given above with respect to claim 1.

New Claims

New claims 12-15 are patentable *at least* by virtue of their dependency on claim 1. Moreover, claim 14 for reasons other than its dependency. For instance, claim 14 recites that the interchangeable dial button unit, the interchangeable line button unit and the interchangeable display unit are *independent* of each other.

Conclusion

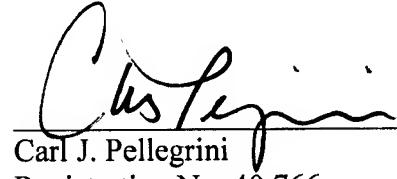
In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

**AMENDMENT UNDER 37 C.F.R. § 1.111
U.S. Application No. 10/764,543**

Attorney Docket No.: Q79605

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



Carl J. Pellegrini
Registration No. 40,766

SUGHRUE MION, PLLC
Telephone: (202) 293-7060
Facsimile: (202) 293-7860

WASHINGTON OFFICE
23373
CUSTOMER NUMBER

Date: March 23, 2007